

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>SUPERSEDING INDICTMENT</u>
)	
Plaintiff,)	JUDGE BENITA Y. PEARSON
)	
v.)	CASE NO. <u>1:22CR609</u>
)	Title 21, United States Code,
AKEEM STAFFORD,)	Sections 841(a)(1), (b)(1)(B),
FREDDIE SANCHEZ,)	(b)(1)(C) and 846
)	Title 18, United States Code,
Defendants.)	Section 2

COUNT 1

(Conspiracy to Possess with the Intent to Distribute a Controlled Substance, 21 U.S.C. §§ 841(a)(1), (b)(1)(B) and 846)

The Grand Jury charges:

1. From on or about August 15, 2022, through September 15, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants AKEEM STAFFORD and FREDDIE SANCHEZ did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2)

The Grand Jury further charges:

2. On or about September 15, 2022, in the Northern District of Ohio, Eastern Division, Defendants AKEEM STAFFORD and FREDDIE SANCHEZ did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance

containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

3. On or about September 15, 2022, in the Northern District of Ohio, Eastern Division, Defendant AKEEM STAFFORD did knowingly and intentionally possess with the intent to distribute approximately 2.5 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1-3 are incorporated herein by reference. As a result of the foregoing offenses, Defendants AKEEM STAFFORD and FREDDIE SANCHEZ shall forfeit to the United States any and all property constituting, and derived from, any proceeds they obtained, directly and indirectly, as the result of such violations; and any and all of their property used and intended to be used, in any manner and part, to commit and to facilitate the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.